

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date filed: February 20, 2010

Name of company covered by this certification: PelTel

Form 499 Filer ID: 820212

Name of signatory: Dean Pelton

Title of signatory: Owner/President

I, Dean Pelton, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

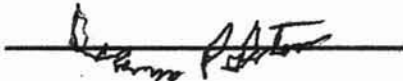
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



attachments (1):

Statement of Company Procedures Involving Protection of CPNI

ATTACHMENT

Statement of Company Procedures Involving Protection of CPNI for PelTel

PelTel (the Company), in general, will comply with the CPNI Safeguard requirements as stated in FCC DA 08-1321, Small Entity Compliance Guide, Customer Proprietary Network Information; and specifically as noted below:

1) Procedures for Verifying Customer Identity Prior to Use of CPNI:

- a) CPNI will only be discussed or released, via telephone access or in-store access, to individuals or customers listed as authorized representatives on a customer's account. The limited non-confidential biographical information, and/or account information that is kept, will not be used prior to establishing that the inquirer is an authorized individual.
- b) CPNI may be discussed or released to authorized third-party companies that perform two-way radio programming functions for PelTel's customers, and is limited to information required to program the radio(s) for operation. CPNI will only be discussed with an authorized programming company.
- c) All personnel and/or authorized programming companies involved in customer transactions is informed of this procedure during their initial training, and once annually during a company meeting.
- d) If it is found that any personnel or authorized programming companies are not following the procedure above, they will be reprimanded, and retrained to follow the procedure. A repeated violation of this procedure will result in termination.

2) Specific CPNI to protect:

- a) The Company does not provide any form of telephone service, and therefore does not have telephone call detail records to protect. The Company does provide Specialized Mobile Radio Dispatch service (two-way radio dispatch service) on an analog system which is not capable of tracking detail information for dispatch calls, therefore, there are no call detail records of any kind on record.
- b) The Company does not have the ability to allow access to CPNI via online internet connections.
- c) The Company does have limited non-confidential biographical, and account balance information for customers which will be protected as per item 1) above.

3) Opt-In/Opt-Out and Sales Marketing Campaigns:

- a) The Company does not partake in or promote Sales or Marketing Campaigns either directly, through affiliates, or through third parties; and CPNI is never used for these purposes. The Company does not partake in any outbound marketing situations. CPNI is never disclosed to third parties, or to any individual or business for sales or marketing purposes.

4) Notification of Breach:

a) In the event of any type of CPNI security breach, the Company will notify law enforcement first pursuant to 47 C.F.R. § 64.2011(b), and then will notify customers, of the breach per the guidelines stated in FCC DA 08-1321, Small Entity Compliance Guide, Customer Proprietary Network Information.